

Hearing Date: January 12, 2006
Hearing Time: 10:00 a.m. (Prevailing Eastern Time)

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UNITED STATES BANKRUPTCY COURT
SOUTHERN DISTRICT OF NEW YORK

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In re	:	Chapter 11
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DELPHI CORPORATION, <u>et al.</u> ,	:	Case No. 05-44481 (RDD)
	:	
Debtors.	:	(Jointly Administered)
	:	
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DEBTORS' OMNIBUS REPLY IN SUPPORT OF DEBTORS' FOURTH OMNIBUS
OBJECTION PURSUANT TO 11 U.S.C. § 502(b) AND FED. R. BANKR. P. 3007 TO
CERTAIN DUPLICATE AND AMENDED CLAIMS

Delphi Corporation ("Delphi") and certain of its subsidiaries and affiliates,
debtors and debtors-in-possession in the above-captioned cases (collectively, the "Debtors"),

hereby submit this omnibus reply (the "Reply") in support of the Fourth Omnibus Objection Pursuant To 11 U.S.C. § 502(b) And Fed. R. Bankr. P. 3007 To Certain Duplicate And Amended Claims (the "Fourth Omnibus Claims Objection"), and respectfully represent as follows:

1. The Debtors filed the Fourth Omnibus Claims Objection on December 8, 2006 to disallow and expunge certain "Claims," as that term is defined in 11 U.S.C. § 101(5), because such Claims are duplicative of other Claims or have been amended or superseded by later-filed Claims. The Debtors sent each claimant whose proof of claim is subject to an objection pursuant to the Fourth Omnibus Claims Objection a personalized Notice Of Objection To Claim, which specifically identified the claimant's proof of claim that is subject to an objection and the basis for such objection. Responses to the Fourth Omnibus Claims Objection were due by 4:00 p.m. (prevailing Eastern time) on January 4, 2007.

2. As of January 10, 2007, the Debtors had received 13 timely-filed formal responses to the Fourth Omnibus Claims Objection (collectively, the "Responses"). For the Court's convenience, a chart summarizing the Responses by respondent is attached hereto as Exhibit A. The 13 formal Responses were all filed by holders of duplicate and amended Claims. Each of the respondents filed duplicative claims against different Debtors for the same asserted obligation because they were unable to determine which Debtor entity was actually liable for their claims. As reflected on Exhibit A hereto, the Debtors believe that the provisions contained in paragraph 3 of the Debtors' proposed order filed with the Fourth Omnibus Claims Objection (the "Original Order") address the concerns of most of the respondents. That provision remains the same in the revised proposed order, a copy of which is attached hereto as Exhibit B (the "Revised Order"). Nonetheless, as set forth on Exhibit A hereto, the Debtors have agreed to adjourn certain of the Responses to a future hearing date.

3. In addition to the Responses, the Debtors also received informal letters, e-mails, and phone calls from various parties requesting clarification of the relief requested in the Fourth Omnibus Claims Objection (the "Informal Responses"). Several Claimants who submitted Informal Responses had filed Claims against multiple Debtor entities for the same liability. In addition, certain of these respondents requested that the Debtors reverse the "Surviving Claim" and the "Claim To Be Expunged" listed on Exhibit A to the Fourth Omnibus Claims Objection (the "Duplicate and Amended Claims Exhibit"). As a result of the Debtors' agreement to revise the Original Order, many of these parties did not file formal responses. The Revised Order and the proposed exhibits thereto reflect the resolutions reached on these Informal Responses. Finally, the Debtors agreed with certain of the parties who raised Informal Responses to adjourn the hearing with respect to those claims to a future hearing date, as set forth on Exhibit C hereto.

4. Except for those Responses and Informal Responses that have been adjourned to future hearing dates, the Debtors believe that the Revised Order adequately addresses the concerns of the respondents. Thus, the Debtors request that the Court approve the relief requested by the Debtors and enter the Revised Order.

WHEREFORE the Debtors respectfully request that this Court enter an order (a) granting the Fourth Omnibus Claims Objection, subject to the modifications reflected in the Revised Order, (b) overruling the Responses, to the extent that any respondent asserts that such respondent's Response is not adequately addressed by the Revised Order, and (c) granting the Debtors such other and further relief as is just.

Dated: New York, New York
January 10, 2007

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